

EXHIBIT B.2

MARK I. SOKOLOW, et al, * IN THE UNITED STATES

Plaintiffs, * DISTRICT COURT

vs. * FOR THE SOUTHERN

THE PALESTINE LIBERATION * DISTRICT OF NEW

ORGANIZATION, et al, * CIVIL ACTION NO.:

Defendants, * 04cv397 (GBD) (RLE)

* * * * *

VOLUME II of II

DEPOSITION OF:

DR. MATTHEW LEVITT,

was held on Wednesday, September 25, 2013,

commencing at 10:37 a.m., at Miller & Chevalier,

655 15th Street, N.W., Suite 900, Washington,

D.C., before Cheryl Jefferies, Certified

Shorthand Reporter.

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1 A. Yes.

2 Q. In fact, what we've marked as Exhibit
3 Number 191, it says at the top, "Work/Shurat
4 HaDin," correct?

5 A. That's right.

6 Q. And you've done work for Shurat HaDin
7 on other matters, right?

8 A. I have.

9 Q. Are you familiar with a term called
10 lawfare, L-A-W-F-A-R-E, all one word?

11 A. I am.

12 Q. What does that mean?

13 A. It's an idea that people try and
14 stymie -- either debated an issue or intimidate
15 someone from investigating an issue by drowning
16 them in frivolous lawsuits.

17 Q. And are you aware whether Shurat HaDin
18 engages in lawfare?

19 MR. HORTON: Object to the form.

20 A. Not to my knowledge, they do not.

21 Q. Have you ever visited Shurat HaDin's

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1 classified or they publicly release it for public
2 use, that's another thing.

3 And, also, frankly, I'm not an Israeli
4 citizen. I have no obligation, like I do to the
5 United States, to protect their classified
6 information as I do my own.

7 Q. Let's do it as a hypothetical then.

8 A. Sure.

9 Q. Assume that Nitsana Darshan-Leitner
10 has said that in the early years, Shurat HaDin
11 took direction from the Government of Israel
12 about which cases to pursue. Assume that she
13 said that. Has she ever told you that?

14 A. No.

15 Q. Do you know if this case is one of the
16 cases that the Government of Israel directed
17 Shurat HaDin to pursue?

18 A. I don't.

19 Q. Do you know if any of the other cases
20 you've worked on for Shurat HaDin, are one of the
21 cases that the Israeli Government directed Shurat

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